

Exhibit 1

CARLOS M. LAZATIN (S.B. #229650)
clazatin@omm.com
WILLIAM K. PAO (S.B. #252637)
wpao@omm.com
XIN-YI ZHOU (S.B. #251969)
vzhou@omm.com
DAVID L. IDEN (S.B. #307494)
diden@omm.com
O'MELVENY & MYERS LLP
400 South Hope Street
18th Floor
Los Angeles, California 90071-2899
Telephone: (213) 430-6000
Facsimile: (213) 430-6407

Attorneys for Defendant
Bitmain Technologies, Ltd.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

GOR GEVORKYAN, on behalf of
himself and all others similarly situated,

Plaintiff,

v.

BITMAIN, INC., BITMAIN
TECHNOLOGIES, LTD. and DOES 1
to 10,

Defendants.

Case No. 3:18-cv-07004-JD

**DEFENDANT BITMAIN
TECHNOLOGIES, LTD.'S
FIRST SET OF
INTERROGATORIES TO
PLAINTIFF GOR
GEVORKYAN**

PROPOUNDING PARTY: Defendant Bitmain Technologies, Ltd.

RESPONDING PARTY: Plaintiff Gor Gevorkyan

SET NUMBER: One

2. If You object to any Interrogatory, state Your objection and the ground or grounds in Your response. If You object to a part of an Interrogatory, Identify the part in Your response and state Your objection and the ground or grounds therefor. No part of an Interrogatory should be left unanswered merely because You object to another part of the Interrogatory.

3. If You contend that any information called for by these Interrogatories is objectionable due to a claim of privilege, provide all responsive information that is not subject to a claim of privilege and provide a statement setting forth the specific facts on which You base Your claim of privilege.

4. Each Interrogatory shall be construed independently, and no Interrogatory shall be viewed as limiting the scope of any other Interrogatory.

INTERROGATORIES

INTERROGATORY NO. 1:

For each Device You purchased that is the subject of this Action, explain the circumstances of the purchase, including: (a) the name and model of the Device purchased; (b) the date of purchase; (c) the date You received the Device; (d) where You received delivery of the Device; (e) where You used the Device; and (f) the purchase price of the Device.

INTERROGATORY NO. 2:

Did You ever attend the California Crypto Mining Forum that You reference in Your Opposition (ECF No. 37 at 1, 6-7)? If so, provide the dates of Your attendance.

INTERROGATORY NO. 3:

Identify all portions of the website at <https://www.bitmain.com/> that You accessed prior to and during the process of purchasing the Devices that are the subject of this Action, including identifying what information You provided to the website.

INTERROGATORY NO. 4:

Identify all advertising, marketing, or promotional material You received from Bitmain or any company you believe to be a Bitmain-related entity that you relied upon in making any of Your purchases alleged in Your Complaint.

INTERROGATORY NO. 5:

Identify all advertising, marketing, or promotional material You received or reviewed from Bitmain or any company You believe to be a Bitmain-related entity at any time.

INTERROGATORY NO. 6:

Have You ever personally visited the San Jose, California office to which You refer in Your Opposition? (ECF No. 37 at 1-2, 5-7, 9, 11-13, 15.) If yes, describe the circumstances of Your visit.

INTERROGATORY NO. 7:

Have You ever spoken with or had any Communications or dealings with Peng Li, to whom You refer in Your Opposition? (ECF No. 37 at 6-7, 11-12.) If yes, describe the circumstances of Your interaction with Mr. Li.

INTERROGATORY NO. 8:

Have You ever had any of Your Devices that are the subject of this Action repaired or serviced at the repair center in Fremont, California that You reference in Your Opposition? (ECF No. 37 at 1, 6, 9, 11, 13, 15.) If yes, describe the circumstances.

INTERROGATORY NO. 9:

Identify all Communications You have ever sent to Bitmain or to a company You believe to be a Bitmain-related entity, or to an individual You believe to be an employee or representative of Bitmain or a Bitmain-related entity.

INTERROGATORY NO. 10:

Identify all Communications You have ever received from Bitmain or from a company You believe to be a Bitmain-related entity, or from an individual You believe to be an employee or representative of Bitmain or a Bitmain-related entity.

Dated: January 21, 2020

/s/ Carlos M. Lazatin

Carlos M. Lazatin
William K. Pao
Xin-Yi Zhou
David L. Iden
O'MELVENY & MYERS LLP
400 South Hope Street
18th Floor
Los Angeles, CA 90071
Telephone: (213) 430-6000
Facsimile: (213) 430-6407
Email: clazatin@omm.com
Email: wpao@omm.com
Email: vzhou@omm.com
Email: diden@omm.com
*Counsel for Defendant Bitmain
Technologies, Ltd.*